

RAMON K. QUICHOCHO, ESQ. (F0243)
LAW OFFICES OF RAMON K. QUICHOCHO, LLC
2nd Floor, Sign Arts Building, San Jose
P.O. Box 505621
Saipan, MP 96950
Tel. No.: 670.234.8946
Fax: 670.234.8920
Email: karissa129@gmail.com

Attorney for Defendant Joaquina V. Santos

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,) CRIMINAL CASE NO.: 08-00020
Plaintiff,)
vs.)
TIMOTHY P. VILLAGOMEZ, ANTHONY C.)
GUERRERO, JOAQUINA V. SANTOS, AND)
JAMES A. SANTOS,)
Defendants.)
STIPULATION TO ENLARG
TO FILE PRETRIAL MO

Plaintiff United States of America, by and through Assistant United States Attorney Eric S. O'Malley and Defendant Joaquina V. Santos, by and through her attorney Ramon K. Quichocho, hereby stipulate as follows:

1. The Court's August 11, 2008 Order Setting Trial Date set August 25, 2008, as the deadline to file all pretrial motions.
2. On August 11, 2008, Richard W. Pierce received Discovery Disc 1 from Plaintiff, which contains several hundred pages of various documents.
3. On August 19, 2008, Quichocho filed a motion to substitute for Pierce, as counsel of record for Defendant Joaquina V. Santos.
4. Quichocho will be off-island for one week during part of September 2008.

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Stipulation to Enlarge Time to File Pretrial Motions

5. Upon approval of the Court, Defendant Joaquina V. Santos shall have until no later than September 22, 2008, to file any pretrial motions.

WHEREFORE, for the foregoing reasons, the parties to this stipulation respectfully request the Court to issue an order granting the parties' stipulation to extend the time for Defendant Joaquina V. Santos to file any pretrial motions by no later than September 22, 2008.

SO STIPULATED, this 21 day of August, 2008.

LEONARDO M. RAPADAS
United States Attorney
Districts of Guam and NMI

By: _____
ERIC S. O'MALLEY
Assistant United States Attorney

LAW OFFICES OF RAMON K. QUICHOCHO, LLC

/s/RAMON K. QUICHOCHO, ESQ.
CNMI Bar No. F0243
Attorney for Joaquina V. Santos